

## Citizens Telephone Cooperative, Inc.

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Ph: (715)237-2605 Fax: (715)237-2812 Website: [www.citizens-tel.net](http://www.citizens-tel.net)

January 25, 2010

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S. W., Suite TW-A325  
Washington, D.C. 20554

**RE: Certification of CPNI Filing, March 1, 2010**  
**FCC Docket EB 06-36**  
**EB-06-TC-060**  
**Citizens Telephone Cooperative, Inc.:**

In accordance with the Public Notice issued by the Enforcement Bureau on February 2, 2006 (DA 06-258), please find attached Citizens Telephone Cooperative, Inc.'s annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI)

Should you have any questions regarding this filing, please direct them to the undersigned at (715)237-2605 or [cittel@citizens-tel.net](mailto:cittel@citizens-tel.net).

Sincerely,

Dennis Bachman  
CEO/General Manager  
Citizens Telephone Cooperative, Inc.

Cc:  
Federal Communications Commission, Enforcement Bureau, Telecommunications Consumers Division,  
445 12<sup>th</sup> Street, SW, Washington, DC 20554

Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington, DC 20554

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: January 25, 2010

Name of company covered by this certification: Citizens Telephone Cooperative, Inc.

Form 499 Filer ID: 801393

Name of signatory: Dennis L Bachman


Title of signatory: CEO/General Manager

I, Dennis L Bachman, certify that I am an officer of the Cooperative named above, and acting as an agent of the Cooperative, that I have personal knowledge that the Cooperative has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Cooperative's procedures ensure that the Cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, see Attachment A.

The Cooperative has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The Cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed 

**Attachment A**  
**Statement Concerning Procedures Ensuring Compliance with CPNI Rules**

The operating procedures of Citizens Telephone Cooperative, Inc. ensure that the Cooperative complies with Part 64, section 2001 *et seq.* of the FCC rules governing the use of CPNI.

The Cooperative has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Cooperative relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Cooperative trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Cooperative has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Cooperative's CPNI Operating Procedures.

The Cooperative maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Cooperative has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Cooperative maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Cooperative requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Cooperative maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.